

Dear Sirs;

First, let me applaud your efforts to include Code Case N-695 into RG 1.147 Rev. 14. One hundred percent of the US utilities are members in and use the Performance Demonstration Initiative (PDI) Program, as reflected in Code Case N-695, to qualify procedures, personnel, and equipment for examination of selected dissimilar metal piping welds. It is applicable to both boiling water reactors and pressurized water reactors. Its inclusion will reduce the burden associated with implementing large numbers of relief requests.

A companion Code Case, N-696, is applicable to the pressurized water reactors, but was not included. As above, one hundred percent of the US utilities are members in and use the Performance Demonstration Initiative (PDI) Program, as reflected in Code Case N-696, to qualify procedures, personnel, and equipment for examination of selected dissimilar metal piping welds from the inside surface. Again, its inclusion will reduce the burden associated with implementing large numbers of relief requests.

Thank you for your consideration.

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